



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF WATER RESOURCES

William R. Snodgrass - Tennessee Tower
312 Rosa L. Parks Avenue, 11th Floor
Nashville, Tennessee 37243-1102

August 18, 2015

Hon. Denny Wayne Robinson
White County Executive
e-copy: executive@whitecountyttn.gov
1 East Bockman Way
White County Courthouse Room 205
Sparta, TN 38583

Subject: **State Operating Permit No. SOP-10056**
Airport Industrial Park
Sparta, White County, Tennessee

Dear Mr. Robinson:

The Division of Water Resources (the division) has received your application for the above referenced project on July 23, 2015. We have reviewed the application for completeness in accordance with TDEC rule 0400-40-05-.05 (2) and find the application to be premature. The collection system you propose to operate requires cooperation by the City of Sparta for sewage treatment and disposal services. The division has delegated Sparta responsibility to implement an industrial pretreatment program, and division regulation requires that Sparta maintain legal authority, enforceable in court, to enforce the requirements of the pretreatment program regulations. Such authority necessitates agreements sufficient to enable enforcement of pretreatment program requirements on any activity contributing wastewater that has potential to upset, or cause pass-through, of the Sparta sewage treatment plant.

Your current collection system operating permit is ultimately ineffective without an agreement with Sparta for treatment and disposal services. Our file record indicates that we proposed a modification to SOP-10056 in 2011 to include interjurisdictional agreement language in the permit. However, the division never received an agreement, and the division did not issue the modification with terms and conditions consistent with any such agreement. Therefore, we request that you provide either a copy of the agreement with Sparta for sewerage treatment and disposal service or documentation regarding White County's plans for negotiating that agreement and the anticipated time line by which the agreement will be developed and executed by the responsible parties.

The division recognizes the effort you have made to reapply for your permit at least 180 days prior to permit expiration. The division has authority to extend the deadline by which applications for renewal are due. Therefore, we are pleased to allow you additional time to provide the requested information.

Please submit a copy of the interjurisdictional agreement with Sparta no later than November 30, 2015, or the time line by which the agreement will be reached no later than September 30, 2015.

You should be aware that in accordance with TDEC Rule 0400-40-05-.05 (2), your receipt of this notice does not preclude the division from later requesting additional material that subsequent to the notice of completeness is determined to be necessary for permit processing.

If you have questions, please contact the Cookeville Environmental Field Office at 1-888-891-TDEC; or, at this office, please contact Mr. Wade Murphy at (615) 532-0666 or by E-mail at *Wade.Murphy@tn.gov*.

Sincerely,



Vojin Janjić
Manager, Water-Based Systems

cc: Mr. Fred Currier, Sparta WWTP Operator in Direct Charge/Pretreatment Coordinator, Sparta STP, se2000@blomand.net
Mr. D.C. Bussell, Public Works Superintendent, City of Sparta, dbussell@blomand.net
Ms. Yatasha Moore, State Pretreatment Program, yatasha.moore@tn.gov
Cookeville Environmental Field Office – DWR; johnny.k.walker@tn.gov
Permit File